

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

COACH USA, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11258 (MFW)

(Jointly Administered)

**NOTICE OF AGENDA FOR HEARING SCHEDULED  
FOR OCTOBER 22, 2024 AT 10:30 A.M. (ET)**

THIS HEARING WILL BE CONDUCTED BY ZOOM. PARTIES AND WITNESSES ARE PERMITTED, BUT NOT REQUIRED, TO APPEAR IN PERSON. THE COURT HAS NO PREFERENCE.

TO ATTEND THE HEARING REMOTELY, PLEASE REGISTER USING THE ECOURT APPEARANCES TOOL ON THE COURT'S WEBSITE AT [WWW.DEB.USCOURTS.GOV](http://WWW.DEB.USCOURTS.GOV) OR CLICK THE BELOW LINK: <https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl>

PARTIES ARE REQUIRED TO REGISTER FOR THE HEARING NO LATER THAN 4:00 P.M. (ET) ONE BUSINESS DAY BEFORE THE HEARING. YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING.

AFTER REGISTERING YOUR APPEARANCE, YOU WILL RECEIVE A CONFIRMATION EMAIL. ZOOM INFORMATION WILL BE SENT OUT PRIOR TO THE HEARING.

**ADJOURNED MATTER**

1. [REDACTED] Debtors' Motion for Entry of (A) an Order (I) Approving Bidding Procedures in Connection with the Sale of Substantially All of the Debtors' Assets, (II) Designating Stalking Horse Bidders and Stalking Horse Bidder Protections, (III) Scheduling Auction for and a Hearing to Approve the Sale of Assets, (IV) Approving Notice of Respective Date, Time and Place for Auction and for a Hearing on Approval of the Sale, (V) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (VI) Approving Form and Manner of Notice Thereof, and (VII) Granting Related Relief; and (B) Orders Authorizing and Approving (I) the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Rights, Encumbrances, and Other Interests, (II) the Assumption and Assignment of Certain Executory Contracts, and Unexpired Leases, and (III) Granting Related Relief [[D.I. 20, 6/12/24](#)]

Objection Deadline: August 1, 2024 at 4:00 p.m. (ET), extended for certain parties to August 7, 2024 at 4:00 p.m. (ET) and as outlined below

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<sup>1</sup> A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/CoachUSA>. The Debtors' mailing address is 160 S Route 17 North, Paramus, NJ 07652.

Related Documents:

- A. Declaration of John Sallstrom [[D.I. 21, 6/12/24](#)]
- B. [SEALED] Debtors' Motion for Entry of (A) an Order (I) Approving Bidding Procedures in Connection with the Sale of Substantially All of the Debtors' Assets, (II) Designating Stalking Horse Bidders and Stalking Horse Bidder Protections, (III) Scheduling Auction for and a Hearing to Approve the Sale of Assets, (IV) Approving Notice of Respective Date, Time and Place for Auction and for a Hearing on Approval of the Sale, (V) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (VI) Approving Form and Manner of Notice Thereof, and (VII) Granting Related Relief; and (B) Orders Authorizing and Approving (I) the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Rights, Encumbrances, and Other Interests, (II) the Assumption and Assignment of Certain Executory Contracts, and Unexpired Leases, and (III) Granting Related Relief [[D.I. 23, 6/12/24](#)]
- C. Order (I) Approving Bidding Procedures in Connection with the Sale of Substantially All of the Debtors' Assets, (II) Designating Stalking Horse Bidders and Stalking Horse Bidder Protections, (III) Scheduling Auction for and a Hearing to Approve the Sale of Assets, (IV) Approving Notice of Respective Date, Time and Place for Auction and for a Hearing on Approval of the Sale, (V) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (VI) Approving Form and Manner of Notice Thereof, and (VII) Granting Related Relief [[D.I. 241, 7/9/24](#)]
- D. Order Granting Leave and Permission to File Omnibus Reply in Support of Debtors' (I) DIP Motion and (II) Bidding Procedures Motion [[D.I. 274, 7/15/24](#)]
- E. Order Granting Agent Leave to File and Serve Response (I) in Support of DIP Financing Motion and (II) in Response to Omnibus Objection of the Committee [[D.I. 275, 7/15/24](#)]
- F. Order (A) Approving (I) the Debtors' Designation of the GP Stalking Horse Bidder for Certain of the Debtors' Assets as Set Forth in the GP Stalking Horse Agreement, (II) the Debtors' Entry into the GP Stalking Horse Agreement, and (III) the Bid Protections and (B) Granting Related Relief [[D.I. 288, 7/16/24](#)]
- G. Notice of Sales, Bidding Procedures, Auction, and Sale Hearing [[D.I. 290, 7/16/24](#)]
- H. Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection With the Sales [[D.I. 297, 7/18/24](#)]
- I. Order (A) Approving (I) the Debtors' Designation of the NewCo Stalking Horse Bidder for Certain of the Debtors' Assets as Set Forth in the NewCo Stalking Horse Agreement, (II) the Debtors' Entry into the NewCo Stalking Horse Agreement, and (III) the Bid Protections and (B) Granting Related Relief [[D.I. 305, 7/19/24](#)]
- J. Notice of Supplemental Possible Assumption and Assignment of Certain Executory

Contracts and Unexpired Leases in Connection with the Sales [[D.I. 313, 7/19/24](#)]

- K. Amended Notice of Sales, Bidding Procedures, Auction, and Sale Hearing [[D.I. 314, 7/19/24](#)]
- L. Notice of Second Supplemental Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 348, 7/25/24](#)]
- M. Notice of Third Supplemental Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 499, 8/7/24](#)]
- N. Notice of Successful Bidders [[D.I. 503, 8/7/24](#)]
- O. Reply of Debtors (I) in Support of the Sales and (II) in Response to the Sale Objections [[D.I. 511, 8/9/24](#)]
- P. Order Authorizing and Approving (I) Purchase Agreement Among Debtors and ABC Bus, Inc., (II) the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Rights, Encumbrances, and Other Interests, (II) the Assumption and Assignment of Certain Executory Contracts, and Unexpired Leases, and (III) Granting Related Relief [[D.I. 535, 8/14/24](#)]
- Q. Order Authorizing and Approving (I) Purchase Agreement Among Debtors and Avalon Transportation, LLC, (II) the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Rights, Encumbrances, and Other Interests, (II) the Assumption and Assignment of Certain Executory Contracts, and Unexpired Leases, and (III) Granting Related Relief [[D.I. 536, 8/14/24](#)]
- R. Order Authorizing and Approving (I) Purchase Agreement Among Debtors and Great Plains Crew Change Company, LLC, (II) the Sale of the Debtors' Assets Free and Clear of Liens, Claims, Rights, Encumbrances, and Other Interests, (II) the Assumption and Assignment of Certain Executory Contracts, and Unexpired Leases, and (III) Granting Related Relief [[D.I. 537, 8/14/24](#)]
- S. Order (A) Approving the Sale of Certain of the Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Related Relief [[D.I. 538, 8/14/24](#)]
- T. Notice of Hearing [[D.I. 546, 8/15/24](#)]

Objections Filed:

A. Informal Responses

- i. 349 First Street Urban Renewal Corp and CenterPoint Properties Trust (resolved via *Order Authorizing the Assumption, Assignment and Sale of the Elizabeth Lease* [[D.I. 738, 9/25/24](#)])
- ii. Pennzoil-Quaker State Company and Shell Canada Products (resolved)

B. Limited Objection and Reservation of Rights of Cintas Corporation with Respect to any Proposed Sale in Accordance with the Order (I) Approving Bidding Procedures in Connection with the Sale of Substantially All of the Debtors' Assets, (II) Designating Stalking Horse Bidders and Stalking Horse Bidder Protections, (III) Scheduling Auction for and a Hearing to Approve the Sale of Assets, (IV) Approving Notice of Respective Date, Time and Place for Auction and for a Hearing on Approval of the Sale, (V) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (VI) Approving Form and Manner of Notice Thereof, and (VII) Granting Related Relief [[D.I. 464, 8/1/24](#)] (resolved)

C. Samsara Networks Inc's Limited Objection and Reservation of Rights Regarding Cure Amounts in Response to Debtors' Notices of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 469, 8/1/24](#)]

D. Oracle's Limited Objection and Rights Reservation Regarding Debtors' Sale Motion [[D.I. 471, 8/1/24](#)] (resolved)

E. Objection of Gerdaneu, Inc. to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 473, 8/1/24](#)] (resolved)

F. Niagara Frontier Transportation Authority's Limited Objection to and Reservation of Rights Regarding Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales of Coach USA, Inc. and its Affiliated Debtors [[D.I. 475, 6/1/24](#)] (resolved)

G. Limited Objection of 750 Somerset Partners, LLC to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 487, 8/6/24](#)] (resolved)

H. Objection of Banc of America Leasing & Capital, LLC to Debtors' Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [D.I. 297] [[D.I. 492, 8/7/24](#)] (resolved pending approval of *Stipulation and Agreed Order Regarding Master Lease Agreement*, filed at [D.I. 827, 10/17/24](#))

I. Baltimore County, Maryland's Limited Objection and Reservation of Rights Regarding Cure Amounts in Response to Debtors' Second Supplemental Notice of

Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with The Sales [[D.I. 493, 8/7/24](#)]

- J. Objection and Reservation of Rights of Cintas Corporation to Notice of Second Supplemental Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 496, 8/7/24](#)] (resolved)
- K. Limited Objection and Reservation of Rights of Township of East Brunswick to Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 498, 8/7/24](#)] (resolved)
- L. Limited Objection and Reservation of Rights of the City of Philadelphia to Potential Assumption of Executory Contracts and Unexpired Leases [[D.I. 502, 8/7/24](#)]
- M. Supplement to Limited Objection and Reservation of Rights of the City of Philadelphia to Potential Assumption of Executory Contracts and Unexpired Leases [[D.I. 506, 8/8/24](#)]
- N. Union Station Redevelopment Corporation's Limited Objection and Reservation of Rights to Debtors' Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 509, 8/9/24](#)] (resolved)
- O. Objection of RJC Investments, LLC to Notice of Third Supplemental Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 560, 8/21/24](#)] (contract will be rejected, and Debtors are no longer seeking to assume and assign the contract, pending entry of *Order (I) Authorizing the Debtors to Reject an Unexpired Lease of Nonresidential Real Property, Effective as of Rejection Date, (II) Abandon Any Remaining Personal Property, and (III) Granting Related Relief*, filed at [D.I. 828, 10/18/24](#))
- P. Riskified Inc's Objection to the Fourth Supplemental Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sales [[D.I. 780, 10/8/24](#)] (resolved)

Status: The responses that have not been resolved or overruled are adjourned to a later date to be agreed between the parties, or November 25, 2024 at 11:30 a.m. (ET), as applicable.

**MATTERS SUBMITTED UNDER CERTIFICATE OF NO OBJECTION OR CERTIFICATION OF COUNSEL**

- 2. Motion of Joanne Bierly, Cheri Brown, and Nancy Shenk for Relief from the Automatic Stay [[D.I. 730, 9/25/24](#)]

Objection Deadline: October 14, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Related Document:

A. Certification of Counsel [[D.I. 814, 10/16/24](#)]

Objections Filed: None

Status: An order has been submitted under certification of counsel.

3. Debtors' Third Omnibus Motion for Entry of an Order (I) Authorizing the Debtors to Reject (A) Unexpired Leases of Nonresidential Real Property and (B) Executory Contracts, in Each Case, Effective as of the Rejection Date, (II) Abandon Any Remaining Personal Property, and (III) Granting Related Relief [[D.I. 758, 9/30/24](#)]

Objection Deadline: October 15, 2024 at 4:00 p.m. (ET)

Related Document:

A. Certificate of No Objection [[D.I. 816, 10/16/24](#)]

Objections Filed: None

Status: A certificate of no objection has been filed. No hearing is necessary unless the Court has questions.

4. Debtors' Motion for Entry of an Order Extending the Exclusive Periods for the Filing of a Chapter 11 Plan and Solicitation of Acceptances There of [[D.I. 769, 10/4/24](#)]

Objection Deadline: October 15, 2024 at 4:00 p.m. (ET)

Related Document:

A. Certificate of No Objection [[D.I. 815, 10/16/24](#)]

Objections Filed: None

Status: A certificate of no objection has been filed. No hearing is necessary unless the Court has questions.

5. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Reject an Unexpired Leases of Nonresidential Real Property, Effective as of the Rejection Date, (II) Abandon Any Remaining Personal Property, and (III) Granting Related Relief [[D.I. 774, 10/7/24](#)]

Objection Deadline: October 15, 2024 at 4:00 p.m. (ET)

Related Document:

A. Certification of Counsel [[D.I. 828, 10/18/24](#)]

Objections Filed:

A. Informal Response from RJC Investments, LLC

Status: An order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

6. Motion of Chelsi Brooks-Hislop for Order Granting Relief from the Automatic Stay [[D.I. 778, 10/8/24](#)]

Objection Deadline: October 15, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Related Document:

- A. Certification of Counsel [[D.I. 822, 10/17/24](#)]

Objections Filed: None

Status: An order has been submitted under certification of counsel.

7. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Reject an Unexpired Leases of Nonresidential Real Property, Effective as of the Rejection Date, (II) Abandon Any Remaining Personal Property, and (III) Granting Related Relief [[D.I. 774, 10/7/24](#)]

Objection Deadline: October 15, 2024 at 4:00 p.m. (ET)

Related Document:

- B. Certification of Counsel [[D.I. 828, 10/18/24](#)]

Objections Filed:

- B. Informal Response from RJC Investments, LLC

Status: An order has been submitted under certification of counsel. No hearing is necessary unless the Court has questions.

### **CONTESTED MATTERS GOING FORWARD**

8. Motion for Relief from Stay [[D.I. 302, 7/19/24](#)]

Objection Deadline: August 14, 2024, extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

9. Jeronesha Harris's Motion for Relief from the Automatic Stay [[D.I. 340, 7/23/24](#)]

Objection Deadline: August 6, 2024, extended to October 18, 2024



Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

10. Motion of Young Il An, Tanya Christine Scheer, and Kristen Pegram for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code [[D.I. 529, 8/13/24](#)]

Objection Deadline: August 27, 2024 at 5:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

11. Motion of Minnie May for Relief from the Automatic Stay [[D.I. 590, 8/27/24](#)]

Objection Deadline: September 11, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

12. Soad Ortiz Pavon and Sandra Pereira's Motion for Relief from the Automatic Stay [[D.I. 599, 8/28/24](#)]

Objection Deadline: September 16, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

13. Mario Pavon's Motion for Relief from the Automatic Stay [[D.I. 605, 8/28/24](#)]

Objection Deadline: September 16, 2024 at 4:00 p.m. (ET), extended to October 18, 2024



Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

- 14. Motion of Vickey Wentland for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [[D.I. 608, 8/28/24](#)]

Objection Deadline: September 12, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

- 15. Debtors' Motion for Entry of an Order Clarifying and Enforcing the Scope of the Automatic Stay [[D.I. 628, 9/3/24](#)]

Objection Deadline: September 17, 2024 at 4:00 p.m. (ET), extended to October 2, 2024 at 4:00 p.m. (ET) with respect solely to Progressive Spine & Orthopaedics and Jose Zabaleta

Related Documents:

- A. Re-Notice of Motion [[D.I. 697, 9/18/24](#)]

Objections Filed:

- A. Limited Objection and Reservation of Rights of Minnie May to the Debtors' Motion for Entry of an Order Clarifying and Enforcing the Scope of the Automatic Stay [[D.I. 688, 9/17/24](#)]
- B. Progressive Spine & Orthopaedics' Brief in (I) Opposition to Debtors' Motion for Entry of an Order Clarifying and Enforcing the Scope of the Automatic Stay; and, in the Alternative, (II) in Support of Cross-Motion for Relief From the Automatic Stay [[D.I. 690, 9/17/24](#)]

Status: This matter is going forward as against the California Action only. The Motion is withdrawn as against Progressive Spine & Orthopaedics and the associated New Jersey Action. With respect to Progressive's request for relief from the automatic stay, the Debtors will consent to such relief, subject to the entry of a mutually agreed upon consent order.

16. Motion of Olga Collins and Jack Collins for Relief from Stay Under Section 362 of the Bankruptcy Code [[D.I. 665, 9/13/24](#)]

Objection Deadline: September 30, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

17. Motion of Romeu Branco Dasilya for Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d) of the Bankruptcy Code [[D.I. 666, 9/13/24](#)]

Objection Deadline: October 15, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

18. Motion of and T.L.G., a Minor By His Guardian Ad Litem Alexandra Danko Gori, and Alexandra Danko Gori Individually for Relief from Stay Under Section 362 of the Bankruptcy Code [[D.I. 668, 9/13/24](#)]

Objection Deadline: September 30, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

19. Motion of Adebimpe Agiri for Relief from the Automatic Stay to Proceed with State Court Personal Injury Action [[D.I. 677, 9/16/24](#)]

Objection Deadline: October 15, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

20. Motion of Aleksandra Hanegby as Administrator of the Estate of Daniel Hanegby for Entry of an Order Granting (I) Relief from the Automatic Stay and (II) Related Relief [[D.I. 694, 9/18/24](#)]

Objection Deadline: October 3, 2024 at 4:00 p.m. (ET), extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. Additionally, the Debtors have received multiple informal objections from various excess insurers. This matter is going forward on a limited basis.

21. David Fetkovich's Motion for Relief from the Automatic Stay [[D.I. 718, 9/23/24](#)]

Objection Deadline: October 11, 2024, extended to October 18, 2024

Objections Filed:

- A. Debtors' Limited Omnibus Objection to Proposed Orders Granting Relief from the Automatic Stay [[D.I. 829, 10/18/24](#)]

Status: The parties are continuing to negotiate a consensual form of order approving the motion. This matter is going forward on a limited basis.

*[Signature page follows]*

Dated: October 18, 2024  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR,  
LLP**

/s/ Joseph M. Mulvihill

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- and -

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